



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

JUL 21 2016

Robert E. Alger, President/CEO
The Lane Construction Corporation
90 Fieldstone Court
Cheshire, Connecticut 06410-1212

Re: Clean Air Act Reporting Requirement

Dear Mr. Alger:

The United States Environmental Protection Agency ("EPA") is evaluating whether The Lane Construction Corporation ("Lane Construction"), located at 837 Waldoboro Road in Washington, Maine, is in compliance with the Clean Air Act ("CAA" or "the Act") and requirements promulgated under the Act.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

In particular, EPA is evaluating the facility's applicability to and compliance with the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines found at 40 C.F.R. Part 63, Subpart ZZZZ and the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources found at 40 C.F.R. Part 63, Subpart JJJJJ.

Reporting Requirement

Lane Construction is required to provide all of the information outlined below within 45 days of the date it receives this letter. Provide a separate response to each numbered paragraph or

subparagraph below. Where possible, provide responses in an electronic spreadsheet format (preferably Microsoft Excel).

- 1) Provide the information requested in each sub-paragraph below for each stationary internal combustion engine that Lane Construction owns and/or operates. (Note: for the purposes of this reporting requirement, stationary shall mean any and all engines that remain, or have remained in the past, in the same location for 12 consecutive months or more).
 - a. The designation and location;
 - b. The purpose (e.g., to provide mechanical power, to provide primary electrical power, emergency generator, fire pump, etc.);
 - c. The ISO New England Operating Procedure, if any, and the date the engine first operated under the procedure;
 - d. The manufacturer, model number, and serial number;
 - e. The month, day, and year of manufacture;
 - f. The month, day, and year of purchase (the date when a binding contract was in place to purchase the engine);
 - g. The month, day, and year of installation;
 - h. The ignition type (i.e., spark or compression);
 - i. The maximum output capacity (in brake horsepower, horsepower and kilowatts);
 - j. The displacement value of the cylinders (liters/cylinder);
 - k. Itemized hours of operation, including the purpose for operation, for calendar years 2013, 2014 and 2015;
 - l. Whether or not the engine has an emissions control system, such as a catalytic oxidizer;
 - m. Whether or not the engine has an open or closed crankcase ventilation system. If the engine has an open crankcase ventilation system, provide information on whether the engine is equipped with an open crankcase filtration emission control system (e.g., properly functioning "breather cap" or some other type of device); and
 - n. Whether or not you have a "Certificate of Conformity" provided by the manufacturer. Provide copies of each certificate to EPA and indicate which certificate is associated with which engine.
- 2) For any engines owned and/or operated by the facility that have not remained in the same location for 12 consecutive months or more, identify these engines in your response. Indicate how often you move these engines and describe the reason for moving these engines.
- 3) For all of the stationary internal combustion engines described in your response to Question 1 above, indicate whether you submitted to EPA and/or ME DEP any of the following documents pursuant to 40 C.F.R. Part 63. If you answer "yes" to any sub-paragraph below, provide copies of each document:
 - a. Initial notifications;
 - b. Notifications of intent to test;
 - c. Initial performance test reports or other initial compliance demonstrations;
 - d. Notifications of compliance status;
 - e. Percent load reports;

- f. Site specific monitoring plans;
 - g. Performance evaluations of the continuous parameter monitoring systems (e.g., the temperature monitors measuring temperature at the inlet to the oxidation catalysts associated with the engines); and
 - h. Semiannual or annual compliance reports.
- 4) If the facility has any boilers, provide the following information for each boiler. (Include any boilers currently in use or that have been taken out of service since 2010):
- a. The name of the manufacturer, model number, and rated capacity (mmBTU/hr);
 - b. The date of purchased;
 - c. The date installation was completed;
 - d. The date of initial operation;
 - e. The date of removal from service (if applicable);
 - f. The types and annual amounts of fuel burned from January 1, 2012 to December 31, 2014;
 - g. The dates of any tune-ups performed ;
 - h. Whether or not an energy assessment was performed;
 - i. Whether you have submitted a notification of compliance status to EPA and/or the ME DEP; and
 - j. Whether you have performed any performance tests.

Be aware that if Lane Construction does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

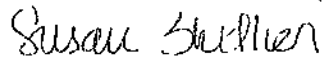
You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien, Director
Office of Environmental Stewardship
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Steven Calder

If you have any questions regarding this Reporting Requirement, please contact Steven Calder at (617) 918-1744, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

A handwritten signature in cursive script that reads "Susan Studlien".

Susan Studlien, Director
Office of Environmental Stewardship

cc: Eugene Weldon, Lane Construction Company
Louis Fontaine, ME DEP